

Steven W. Golden
Jeffrey M. Dine
Mary F. Caloway (*pro hac vice* forthcoming)
Victoria A. Newmark (*pro hac vice* forthcoming)
PACHULSKI STANG ZIEHL & JONES LLP
1700 Broadway, 36th Floor
New York, New York 10019
Telephone: 212-561-7700
Facsimile: 212-561-7777

Counsel to the Foreign Representative

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re: IOVATE HEALTH SCIENCES INTERNATIONAL INC., ¹ Debtor in a Foreign Proceeding.	Chapter 15 Case No. 25-11958 (MG)
In re: IOVATE HEALTH SCIENCES U.S.A. INC., ² Debtor in a Foreign Proceeding.	Chapter 15 Case No. 25-11959 (MG)
In re: NORTHERN INNOVATIONS HOLDING CORP., ³ Debtor in a Foreign Proceeding.	Chapter 15 Case No. 25-11960 (MG)

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- ¹ The last four digits of Iovate Health Sciences International Inc.'s Canadian Business Number are 0696, and the location of its corporate head office is 381 North Service Road West, Oakville, Ontario, Canada L6M 0H4.
- ² The last four digits of Iovate Health Sciences U.S.A. Inc.'s United States Tax Identification Number are 3542, and the location of its corporate head office is 381 North Service Road West, Oakville, Ontario, Canada L6M 0H4.
- ³ The last four digits of Northern Innovations Holding Corp.'s Canadian Business Number are 3909, and the location of its corporate head office is 381 North Service Road West, Oakville, Ontario, Canada L6M 0H4.

**MOTION FOR ORDER (I) DIRECTING JOINT ADMINISTRATION OF
CASES UNDER CHAPTER 15 OF THE BANKRUPTCY CODE AND (II)
AUTHORIZING FOREIGN REPRESENTATIVE TO FILE CONSOLIDATED
LISTS OF INFORMATION REQUIRED BY BANKRUPTCY RULE 1007(a)(4)**

Iovate Health Sciences International Inc. ("Iovate International"), in its capacity as the authorized foreign representative (the "Foreign Representative") of foreign debtors Iovate International, Iovate Health Sciences U.S.A. Inc. ("Iovate USA"), and Northern Innovations Holding Corp. ("Northern Innovations" and, together with Iovate International and Iovate USA, the "Debtors") in respect of that certain insolvency proceeding (together with any successor proceeding, the "Canadian Proceeding") commenced pursuant to section 50.4 of Canada's Bankruptcy and Insolvency Act (R.S.C. 1985, c. B-3) (the "BIA"), pending before the Ontario Superior Court of Justice (Commercial List) (the "Canadian Court"), by and through its undersigned counsel, respectfully submits this motion (the "Motion") and represents as follows:

Relief Requested

1. The Foreign Representative respectfully requests entry of an order, substantially in the form attached hereto as **Exhibit A** (the "Order"): (a) directing joint administration of the Debtors' related chapter 15 cases (the "Chapter 15 Cases") pursuant to rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") for procedural purposes only; and (b) authorizing the Foreign Representative to file consolidated lists of information required by Bankruptcy Rule 1007(a)(4) (the "Consolidated Lists").

2. Specifically, the Foreign Representative requests that the Court maintain one file and one docket for all of the Chapter 15 Cases under the case number assigned to Debtor

Iovate International, and that these Chapter 15 Cases be administered under the following caption (the “Proposed Caption”):

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

IOVATE HEALTH SCIENCES
INTERNATIONAL INC.,¹

Debtors in a Foreign Proceeding.

Chapter 15

Case No. 25-11958 (MG)

(Jointly Administered)

¹ The Debtors in the Canadian Proceeding, along with the last four digits of each Debtor’s United States Tax Identification Number or Canadian Business Number, as applicable, are as follows: (i) Iovate Health Sciences International Inc. (0696); (ii) Iovate Health Sciences U.S.A. Inc. (3542); and (iii) Northern Innovations Holding Corp. (3909).

3. The Foreign Representative further requests that the Court order that the foregoing caption satisfies the requirements set forth in section 342(c)(1) of the Bankruptcy Code.

4. The Foreign Representative also seeks the Court’s direction that a notation substantially similar to the following be entered on the docket in each of these Chapter 15 Cases, other than on the docket of the case of Iovate Health Sciences International, Inc., to reflect the joint administration of these cases:

An order has been entered in this case directing the procedural consolidation and joint administration of the Chapter 15 Cases of: Iovate Health Sciences International Inc. (25-11958) (MG); Iovate Health Sciences U.S.A. Inc. (25-11959) (MG); and Northern Innovations Holding Corp. (25-11960) (MG). The docket in Case No. 25-11958 (MG) should be consulted for all matters affecting this case. **All further pleadings and other papers shall be filed in and all further docket entries shall be made in Case No. 25-11958 (MG).**

5. Further, the Foreign Representative requests that the Court authorize the Foreign Representative to utilize a combined service list for the jointly-administered Chapter 15 Cases and that combined notices be sent to the Debtors' creditors and other parties in interest as applicable.

Jurisdiction and Venue

6. The United States Bankruptcy Court for the Southern District of New York (the "Court") has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and *Amended Standing Order of Reference* dated January 31, 2012, Reference M-431, *In re Standing Order of Reference Re: Title 11*, 12 Misc. 00032 (S.D.N.Y. Feb. 2, 2012) (Preska, CJ) (the "Amended Standing Order"). This matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(P).

7. The Foreign Representative has properly commenced these Chapter 15 Cases under sections 1504 and 1509 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the "Bankruptcy Code") by the filing of verified petitions for recognition of the Canadian Proceedings (the "Verified Petitions") under section 1515 of the Bankruptcy Code.

8. Venue is proper in this district pursuant to 28 U.S.C. § 1410.

9. The bases for relief are sections 101(2) and 105(a) of the Bankruptcy Code and Bankruptcy Rules 1007, 1015(b), and 2002.

Background

10. On the date hereof (the "Petition Date"), the Foreign Representative filed petitions for recognition under chapter 15 of the Bankruptcy Code (the "Chapter 15 Petitions") for each of the Debtors. A description of the Debtors' business and the events leading up to the

commencement of the Canadian Proceeding and these Chapter 15 Cases is included in the *Declaration of Wesley Parris in Support of (I) Verified Chapter 15 Petitions, (II) Foreign Representative's Motions for Orders Granting Provisional and Final Relief in Aid of Canadian Proceeding, and (III) Certain Related Relief* (the "Parris Declaration"), filed concurrently herewith and fully incorporated herein by reference

Basis for Relief

A. Joint Administration Is Appropriate in These Chapter 15 Cases.

11. Bankruptcy Rule 1015(b) provides that if two or more petitions for relief are pending in the same court by or against a debtor and its affiliate, the Court may order joint administration of the cases. As set forth in the Chapter 15 Petitions and in the Parris Declaration, the Debtors are "affiliates" as the Bankruptcy Code defines that term in section 101(2).

12. Joint administration will be an administrative convenience for the Court, the clerk's office, and other interested parties. Entry of an order directing joint administration of these Chapter 15 Cases will avoid duplicative notices and motions, thereby saving the Foreign Representative and all other parties in interest considerable time and expense. This Motion will not adversely affect the rights of creditors because it requests only administrative consolidation of these Chapter 15 Cases. Joint administration will not affect any rights that creditors have in or against a particular Debtor, and will permit interested parties to look to one bankruptcy case docket with regard to relief that may be sought or ordered with respect to the Debtors in these Chapter 15 Cases. Granting this Motion will also relieve the Court of the burden of entering duplicative orders and maintaining duplicative files.

13. Courts in this district and others have approved joint administration relief similar to that requested herein in other chapter 15 cases. *See, e.g., In re Li-Cycle Holdings Corp.*, No. 25-10991 (PB), Docket No. 6 (Bankr. S.D.N.Y. May 14, 2025); *In re Touradjii Private Equity Master Fund Ltd.*, No. 23-10172 (PB), Docket No. 12 (Bankr. S.D.N.Y. Feb. 7, 2023); *In re Markel CATCo Reinsurance Fund Ltd.*, No. 21-11733 (LGB), Docket No. 9 (Bankr. S.D.N.Y. Oct. 6, 2021); *In re STS Renewables Ltd.*, No. 25-10884 (KBO), Docket No. 19 (Bankr. D. Del. May 20, 2025).

14. The Foreign Representative submits that joint administration of these Chapter 15 Cases is in the best interests of the Debtors, their creditors, and all other interested parties, and that no conflict of interest should arise as a result of joint administration. Requiring separate administration of these Chapter 15 Cases would subject the Foreign Representative (who would be forced to file documents on numerous dockets) and creditors (who would be forced to monitor numerous dockets) to unnecessary administrative burdens. For all of the foregoing reasons, the Foreign Representative respectfully requests the entry of an order providing for the joint administration of these Chapter 15 Cases.

B. Consolidated Bankruptcy Rule 1007(a)(4) List

15. The Court should also permit the Foreign Representative to file information required by Bankruptcy Rule 1007(a)(4) on a consolidated basis across all Debtors. In pertinent part, Bankruptcy Rule 1007(a)(4) provides that:

If a foreign representative files a petition under Chapter 15 for recognition of a foreign proceeding, the representative must . . . include with the petition:

(A) a corporate-ownership statement containing the information described in Rule 7007.1; and

(B) unless the court orders otherwise, a list containing the names and addresses of:

(i) all persons or bodies authorized to administer the debtor's foreign proceedings;

(ii) all entities against whom provisional relief is sought under § 1519; and

(iii) all parties to litigation pending in the United States in which the debtor was a party when the petition was filed.⁴

16. The Foreign Representative submits that the filing of a consolidated Bankruptcy Rule 1007(a)(4) list will be more efficient and that no interested parties will be prejudiced by the filing of consolidated schedules containing the same information as separate schedules. Accordingly, the Foreign Representative seeks authority to file a consolidated list that identifies the names and addresses of those persons authorized to administer the Canadian Proceeding, parties to litigation pending in the United States in which a Debtor is a party, and all entities against whom provisional relief is being sought.

17. Courts have approved the filing of consolidated Bankruptcy Rule 1007(a)(4) lists in other chapter 15 cases. *See, e.g., In re STS Renewables Ltd.*, No. 25-10884 (KBO), Docket No. 19 (Bankr. D. Del. May 20, 2025); *In re Rokstad Holdings Corporation*, No. 24-12645 (MFW), Docket No. 27 (Bankr. D. Del. Nov. 22, 2024); *In re Touradjii Private Equity Master Fund Ltd*, No. 23-10172 (PB), Docket No. 12 (Bankr. S.D.N.Y. Feb. 7, 2023); *In re Markel CATCo Reinsurance Fund Ltd.*, No. 21-11733 (LGB), Docket No. 9 (Bankr. S.D.N.Y. Oct. 6, 2021).

⁴ Fed. R. Bankr. P. 1007(a)(4).

Notice

18. The Foreign Representative requests that the Court grant this Motion without notice. The Foreign Representative will serve notice of entry of the order in accordance with the procedures set forth in the *Foreign Representative's Motion for Order Scheduling Recognition Hearing and Specifying the Form and Manner of Service of Notice*, filed contemporaneously herewith, consistent with Bankruptcy Rule 2002(q). In light of the nature of the relief requested, the Foreign Representative requests that this Court find that no further notice is required.

No Prior Request

19. No previous request for the relief requested herein has been made to this or any other court.

WHEREFORE, for the reasons set forth herein, the Foreign Representative respectfully requests entry of the Order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein and such other and further relief as is just and proper.

Dated: September 9, 2025

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Steven W. Golden

Steven W. Golden

Jeffrey M. Dine

Mary F. Caloway

Victoria A. Newmark

1700 Broadway, 36th Floor

New York, New York 10019

Telephone: 212-561-7700

Facsimile: 212-561-7777

Counsel to the Foreign Representative

EXHIBIT A

Proposed Order

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re: IOVATE HEALTH SCIENCES INTERNATIONAL INC., ¹ Debtor in a Foreign Proceeding.	Chapter 15 Case No. 25-11958 (MG)
In re: IOVATE HEALTH SCIENCES U.S.A. INC., ² Debtor in a Foreign Proceeding.	Chapter 15 Case No. 25-11959 (MG)
In re: NORTHERN INNOVATIONS HOLDING CORP., ³ Debtor in a Foreign Proceeding.	Chapter 15 Case No. 25-11960 (MG)

**ORDER (I) DIRECTING JOINT ADMINISTRATION OF
CASES UNDER CHAPTER 15 OF THE BANKRUPTCY CODE; AND (II)
AUTHORIZING FOREIGN REPRESENTATIVE TO FILE CONSOLIDATED
LISTS OF INFORMATION REQUIRED BY BANKRUPTCY RULE 1007(a)(4)**

Upon the motion (the “Motion”)⁴ of the Foreign Representative of the above-captioned debtors (collectively, the “Debtors”) for entry of an order (this “Order”): (a) directing the joint administration of these Chapter 15 Cases for procedural purposes only; and (b) authorizing the Foreign Representative to file consolidated lists of information required by Bankruptcy Rule 1007(a)(4); the Court having jurisdiction to consider the Motion and the relief requested therein

¹ The last four digits of Iovate Health Sciences International Inc.’s Canadian Business Number are 0696, and the location of its corporate head office is 381 North Service Road West, Oakville, Ontario, Canada L6M 0H4.

² The last four digits of Iovate Health Sciences U.S.A. Inc.’s United States Tax Identification Number are 3542, and the location of its corporate head office is 381 North Service Road West, Oakville, Ontario, Canada L6M 0H4.

³ The last four digits of Northern Innovations Holding Corp.’s Canadian Business Number are 3909, and the location of its corporate head office is 381 North Service Road West, Oakville, Ontario, Canada L6M 0H4.

⁴ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

pursuant to 28 U.S.C. §§ 157 and 1334; venue being proper before the Court pursuant to § 1410(1) and (3); and that this Court may enter a final order consistent with Article III of the United States Constitution; adequate and sufficient notice of the filing of the Motion having been given by the Foreign Representative; it appearing that the relief requested in the Motion is necessary and beneficial to the Debtors; and after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED that:

1. The Motion is granted as set forth herein.
2. These Chapter 15 Cases shall be, and they hereby are, consolidated pursuant to Bankruptcy Rule 1015(b), for procedural purposes only, and shall be jointly administered by the Court under Case No. 25-11958 (MG).
3. The caption of each of these Chapter 15 Cases shall be modified to reflect the joint administration of these cases, as follows:

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

IOVATE HEALTH SCIENCES
INTERNATIONAL INC.,¹

Debtors in a Foreign Proceeding.

Chapter 15

Case No. 25-11958 (MG)

(Jointly Administered)

¹ The Debtors in the Canadian Proceeding, along with the last four digits of each Debtor's United States Tax Identification Number or Canadian Business Number, as applicable, are as follows: (i) Iovate Health Sciences International Inc. (0696); (ii) Iovate Health Sciences U.S.A. Inc. (3542); and (iii) Northern Innovations Holding Corp. (3909).

4. The foregoing caption satisfies the requirements set forth in section 342(c)(1) of the Bankruptcy Code.

5. A docket entry shall be made in each of the above captioned chapter 15 cases, other than on the docket of the case of Iovate Health Sciences International Inc., to reflect the joint administration of these cases:

An order has been entered in this case directing the procedural consolidation and joint administration of the Chapter 15 Cases of: Iovate Health Sciences International Inc. (25-11958) (MG); Iovate Health Sciences U.S.A. Inc. (25-11959) (MG); and Northern Innovations Holding Corp. (25-11960) (MG). The docket in Case No. 25-11958 (MG) should be consulted for all matters affecting this case. **All further pleadings and other papers shall be filed in and all further docket entries shall be made in Case No. 25-11958 (MG).**

6. The Foreign Representative shall maintain, and the clerk of the Court shall keep, one consolidated docket, one file, and one consolidated service list in these Chapter 15 Cases. The Foreign Representative is authorized to send, as applicable, combined notices to the Debtors' creditors and other parties in interest.

7. The Foreign Representative is authorized to file a consolidated list of the information required by Bankruptcy Rule 1007(a)(4).

8. Nothing contained in the Motion or this Order shall be deemed or construed as directing or otherwise effecting a substantive consolidation of these Chapter 15 Cases.

9. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion and requirements of the Bankruptcy Rules and the Local Bankruptcy Rules are satisfied by such notice.

10. The Foreign Representative is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Motion.

11. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry, and the clerk of the Court is hereby directed to enter this Order on the docket in each Chapter 15 Case of the Debtors.

12. The Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and/or enforcement of this Order.

IT IS SO ORDERED.

Dated: September ____, 2025
New York, New York

UNITED STATES BANKRUPTCY JUDGE